

I respectfully ask the commission to deny request for rulemaking RM-10869 and adopt RM-10867 instead.

RM-10867 by the American Radio Relay League is a necessary and thoughtful proposal to ensure a viable and dynamic Amateur Radio Service for the 21st Century. As an Amateur Radio Extra Class licensee with nearly thirty years experience, I believe RM-10867 better meets and promotes all of the purposes of the Amateur Radio Service as outlined in Part 97. Although I don't personally benefit by any of it's provisions, its prompt adoption by the Commission is respectfully requested for the good of the nation.

As a volunteer Amateur Radio Public Information Officer and Boy Scout Radio Merit Badge counselor, I can assure you that the current Morse code testing requirement for introductory basic High Frequency (HF) Amateur Radio phone privileges is the largest deterrent to prospective hams. Removing this obsolete requirement to give beginners a taste of the HF Amateur radio experience is necessary to fulfill the Part 97 purpose of "Expansion of the existing reservoir within the Amateur Radio service of trained operators, technicians, and electronics experts." Such limited HF phone privileges will encourage them to increase their skills further through on the air activity, especially for those hams in rural areas where VHF activity is limited.

In addition, the beginner HF segments suggested by the league for this activity are where the newcomers can best contribute to emergency operations and public service. This will increase the ability of the Amateur Service to assist in Homeland Defense in these perilous times.

In today's Amateur Radio, Morse code is now just one mode among many, unlike the distant past when it was the only mode of operation. So eliminating it as a hurdle for the first two license classes while retaining a 5 WPM proficiency in it for the Extra Class license is reasonable, since the Extra Class licensee also has to be familiar with all modes of operating, including other specialized modes such as ATV and satellites.

Simplifying the number of license classes from five to three to ease administrative burdens makes a lot of sense as well. As a long time ham and volunteer examiner, I can assure you that the technical content of the Technician exam element is roughly equivalent to the old General exam element and that the old Advanced exam element is similarly equivalent to the current Extra exam element. Thus automatic upgrading of existing Technician class licensees to General and existing Advanced class licensees to Extra is warranted to reduce FCC administrative expense, establish fairness, and make the structure of the service easier to understand.

Once again, now is the time for the FCC to take action to create a 21st Century Amateur Service by approving RM-10867 instead of this one

Sincerely

Gary Wilson, K2GW  
Amateur Extra Class Licensee